

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

CENTRAL DIVISION

ORIGINAL COPY OF: THE EPIC LITIGATIONS UNDER THE FEDERAL OPEN
GOVERNMENT LAWS OF:

MARK PAUL REYNOLDS PRO SE,

9560 STATE ROAD O, STEEDMAN, MISSOURI 65077-1310

PLAINTIFF

V. C.A.NO. _____

DEFENDANT

1. **DEFENDANT, MU HEALTH CARE HEREIN REFERRED TO AS (“MUHC”)**

AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212

REGISTERED AGENT FOR THE DEFENDANT IS: STEPHEN J. OWENS

AT: 227 UNIVERSITY HALL COLUMBIA, MO 65211

THE DEFENDANT MUHC ARE (FBI TASKFORCE PARTICIPANTS WITH
TITLE 5 U.S.C. 552a RESPONSIVE RECORDS) AGENCIES AND AGENTS OF
“STATE AND LOCAL ORGANIZATIONS”

THAT RECEIVES FEDERAL FUNDS;

DEFENDANT: MUHC AGENCY AND COMPONENTS ARE WITHIN THE
MEANING OF 5 U.S.C. 552a (a) (1), AND IS IN POSSESSION AND/OR CONTROL
OF RECORDS PERTAINING TO PLAINTIFF,

MARK PAUL REYNOLDS.

2. **DEFENDANT:** UNIVERSITY HOSPITAL MEDICAL RECORDS,

AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212

3. **DEFENDANT:** M.U. UNIVERSITY HOSPITAL,

AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212

4. **DEFENDANT:** UNIVERSITY OF MISSOURI HEALTH SYSTEM

AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212

5. **DEFENDANT:** UNIVERSITY OF MISSOURI PSYCHIATRIC CENTER

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

6. **DEFENDANT:** JONATHAN CURTRIGHT, MUHC, CEO

AND THE SUBSTITUTE FOR PREDECESSOR, MITCH WASDEN

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

7. **DEFENDANT:** TALLEY MILLER, MEDICAL RECORDS TECH- IV

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

8. **DEFENDANT:** KATHARINE S BUNN, COUNSEL

AT: OFFICE OF THE GENERAL COUNSEL

227 UNIVERSITY HALL COLUMBIA, MO 65211

9. **DEFENDANT:** RONA BIELE, EXECUTIVE STAFF ASSISTANT

GUEST SERVICES REPRESENTATIVE MISSOURI PSYCHIATRIC CENTER

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

10. **DEFENDANT:** MUHAMMAD WAQAR SALAM, MD

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

11. **DEFENDANT:** MOHIT BHARDWAJ, MD, UMPC DOCTOR PETITIONER

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

12. **DEFENDANT:** SUZANNE M KING, MD

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

13. **DEFENDANT:** AMY C BANTZ, SOCIAL WORKER,

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

14. **DEFENDANT:** ALLEN LAVENDER, RESIDENT

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

15. RUTH E MEYER, RN

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65

16. **DEFENDANT:** KISTIN E HAHN-COVER, MD

AT: ONE HOSPITAL DRIVE DC0042.00 COLUMBIA, MO 65212

17. **DEFENDANT:** JOHN YANOS, MD

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

18. **DEFENDANT:** JASON SHOEMAKER, MD

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

19. **DEFENDANT:** SETIA SABEENA, MD

AT: ONE HOSPITAL DRIVE DC0042.00 COLUMBIA, MO 65212

20. DEFENDANT: SHIRLEY J SMITH

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

21. DEFENDANT: ASHLEY HOLMAN

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

22. DEFENDANT: PEGGY A FORD

AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

23. DEFENDANT: NICOLE E. EPSTEIN, JD, MHA, MUHC SYSTEM PRIVACY OFFICER, AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

NOW COMES, MARK PAUL REYNOLDS PRO SE S.S.A. DISABLED PERSON MUHC PATIENT, LIVING, NATURAL, SPIRITUAL, RELIGIOUS, MAN WITH HIS 42 U.S.C. 1988, 42 C.F.R PART 2, 5 U.S.C.552a PRIVACY/FOIA ACT COMPLAINT OF:

MUHC'S GROSS NEGLIGENCE PER SE MALPRACTICE OF LEGAL, MEDICAL AND ETHICAL RECORDS PRIVACY STANDARDS

MUHC GROSS NEGLIGENCE MALPRACTICE HAS VIOLATED THE EXPRESS PROVISIONS OF LAW IN 42 U.S.C.290dd-3, 5 U.S.C. 552a (b) (6)

PRIVACY ACT AND MUHC'S PRIVACY PRACTICES

RESULTING FROM MUHC'S FRAUDULENT MALTREATMENT DETENTION OF MR. REYNOLDS, IN THE MUHC LIBEL USE OF MR. REYNOLDS' 42 C.F.R.

PART 2 DETENTION RECORDS, IN MUHC'S DETENTION RECORDS TITLE 18
U.S.C. 241 CONSPIRACY AGAINST MR. REYNOLDS PATIENT'S CIVIL RIGHTS

**MUHC ARE TRESPASSERS OF LAW, UNDER COLOR OF LAW, IN CLEAR
DEPARTURES FROM GOOD AND ACCEPTED MEDICAL PRACTICES;**

**BY LAW MUHC IS REQUIRED TO PROTECT MR. REYNOLDS'
INFORMATION;**

THE MUHC'S LEGAL WRONGS ALLEGED IN THIS COMPLAINT ARE
ONGOING AND ARE CONTINUING TO OCCUR AT THE PRESENT TIME;

PLAINTIFF BRINGS THIS ACTION FOR DECLARATORY, INJUNCTIVE,
EXPUNGEMENT, RELIEF; NOMINAL DAMAGES, COMPENSATORY DAMAGES,
PUNITIVE DAMAGES, MONETARY RECOVERY RELIEF AND COURT COST
AND ATTORNEY'S FEES PURSUANT TO:

THE FEDERAL DECLARATORY JUDGEMENT ACT, 28 U.S.C. 2201,

FREEDOM OF INFORMATION PRIVACY ACT CIVIL COMPLAINT

TITLE 5 U.S.C. 702 RIGHT OF REVIEW A PERSON SUFFERING LEGAL WRONG
BECAUSE OF MUHC AGENCY ACTIONS IN VIOLATIONS OF

42 U.S.C. 290dd-3 CONFIDENTIALITY OF PATIENT RECORDS;

SEE; 42 U.S.C. A290ee-3 AND 42 U.S.C. A290dd-3 AND 42 C.F.R. PART 2

SEE; 42 U.S.C.A290ee-3(2) (c), 42 U.S.C. A290-dd-3(2) (c). AND 42 C.F.R A2.61

SEE; UNITED STATES V GRAHAM, 548 F. 2d 1302, 1314 (8TH CIR. 1977)

IN FORMAL PROCEEDING TO ENFORCE PROVISIONS OF LAWS; TITLE 42 CFR PART 2, CRM 1872 CONFIDENTIALITY OF PATIENT RECORDS; IN TITLE 42 U.S.C. 1988-PROCEEDINGS IN VINDICATION OF CIVIL RIGHTS, 42 U.S.C. PROVISION OF SECTIONS 1981, 1982, 1983, 1985, AND 42 U.S.C. 1988 CIVIL RIGHTS ACT 1866, 18 U.S.C. 241, THE PRIVACY ACT OF 1974, 5 U.S.C. 552a et seq., THE FREEDOM OF INFORMATION ACT 5 U.S.C. 552a et seq., THE FEDERAL DECLARATORY JUDGEMENT ACT, 28 U.S.C. 2201, 1361, PUBLIC LAW 110-180, TITLE 18 U.S.C. 249, PUBLIC LAW 110- 180, TITLE 18 U.S.C. SEC. 922, ETC.

610.140, 120 RSMO TITLE 42 CRF PART 2, TITLE 5 U.S.C. 552(a) (4) (B) FOIA PERMITS LAWSUIT FOR INJUNCTION EXPUNGEMENT RELIEF;

FOR MUHC'S VIOLATIONS OF MR. REYNOLDS' CIVIL RIGHTS AS SAID RIGHTS ARE SECURED BY SAID STATUTES AND CONSTITUTIONS OF THE STATE OF MISSOURI AND THE UNITED STATES.

ONLY THROUGH REPETITIVE SUNSHINE/PA/FOIA DISCOVERY RECORDS REQUESTS MUHC ON 5/16/ 2019 RELEASED RECORDS;

FEW DAYS AFTER 5/16/2019 MR. REYNOLDS DISCOVERED FACTS OF

MUHC'S FRAUDULENT DETENTIONS RECORDS CONSPIRACIES

IN VIOLATIONS OF MR. REYNOLDS'

PATIENT PRIVACY AND CIVIL RIGHTS

PLAINTIFF MARK PAUL REYNOLDS PROSE (HEREIN REFERRED TO AS MR. REYNOLDS) COMPLAINING OF THE DEFENDANTS (HEREIN REFERRED TO AS MUHC) RESPECTFULLY ALLEGE AS FOLLOWS:

PLAINTIFF CLAIMS RIGHTS AND PRIVILEGES OF

A MALTREATED RSMO 565.184 VULNERABLE PERSON AND

ACTION STATUS OF PROTECTED CLASS

MR. REYNOLDS IS A FEDERALLY PROTECTED CLASS OF PATIENT CITIZEN UNDER SOCIAL SECURITY DISABILITY. **AS OF SEPTEMBER 15, 2008,**

MR. REYNOLDS IS A FEDERALLY PROTECTED CLASS OF PATIENT CITIZEN UNDER TITLE 42 CFR PART 2, CRM 1872, **AS OF JUNE 11, 2010;**

SEE; TITLE 18 U.S.C. 245 (2) (E) TITLE 42 CFR PART 2 FEDERALLY PROTECTED ACTIVITIES (PARTICIPANT)

MR. REYNOLDS IS A POOR PERSON LIVING ON SSA BENEFITS WITH LIMITED MONTHLY FINANCIAL RESOURCES.

MR. REYNOLDS IS A S.S.A. DISABLED **RSMO 565.184** PROTECTED PERSON FROM **FINANCIAL EXPLOITATION**-IS THE ILLEGAL OR IMPROPER USE OF A DISABLED PERSON'S FUNDS, PROPERTY, OR ASSETS FOR ANOTHER PERSON'S GAIN OR PROFIT THROUGH THE USE OF UNDUE INFLUENCE,

MISREPRESENTATION, **UNETHICAL OR ILLEGAL MEANS TO ACQUIRE PROPERTY OR FUNDS;**

PLAINTIFF IS SEEKING RELIEF FROM THE MUHC'S REFUSAL TO ACKNOWLEDGE THE DEPRIVATIONS OF MR. REYNOLDS' LIBERTIES;

PLAINTIFF IS SEEKING RELIEF FROM MUHC'S (*ONGOING AT THE PRESENT TIME*) BREACH OF PATIENT'S PRIVACY RIGHTS, CIVIL LIBERTIES AND CIVIL RIGHTS WITHIN TITLE 5 U.S.C. 552a RECORDS;

PLAINTIFF IS SEEKING JUDICIAL DECLARATORY, INJUNCTIVE AND EXPUNGEMENT RELIEF FROM THE MUHC'S LIBEL RECORDS USE OF MR. REYNOLDS' 42 C.R.F. PART 2 IDENTITIES DATA;

I. PARTIES

A. PLAINTIFF, PLAINTIFF HEREIN REFERRED TO AS ("MR. REYNOLDS").

TITLE 42 C.F.R. PART 2, PATIENT: # 122-88-33-6, ACCOUNT: # 1158911

MARK PAUL REYNOLDS PRO SE IS A CITIZEN OF THE UNITED STATES AND THE STATE OF MISSOURI AND RESIDES IN COUNTY OF CALLAWAY.

1. B. DEFENDANT, MU HEALTH CARE HEREIN REFERRED TO AS ("MUHC") AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212

REGISTERED AGENT FOR THE DEFENDANT IS: STEPHEN J. OWENS

AT: 227 UNIVERSITY HALL COLUMBIA, MO 65211

THE DEFENDANT MUHC ARE (FBI TASKFORCE PARTICIPANTS WITH TITLE 5 U.S.C. 552a RESPONSIVE RECORDS) AGENCIES AND AGENTS OF “STATE AND LOCAL ORGANIZATIONS” THAT RECEIVES FEDERAL FUNDS;

DEFENDANT: MUHC AGENCY AND COMPONENTS ARE WITHIN THE MEANING OF 5 U.S.C. 552a (a) (1), AND IS IN POSSESSION AND/OR CONTROL OF RECORDS PERTAINING TO PLAINTIFF,

MARK PAUL REYNOLDS

- 2. DEFEENDANT:** UNIVERITY HOSPITAL MEDICAL RECORDS, **AT:** ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212, **3. DEFENDANT:** M.U. UNIVERSITY HOSPITOL, **AT:** ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212, **4. DEFENDANT:** UNIVERSITY OF MISSOURI HEALTH SYSTEM, **AT:** ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212, **5. DEFENDANT:** UNIVERSITY OF MISSOURI PHYCHIATIC CENTER, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **6. DEFENDANT:** JONATHAN CURTRIGHT, MUHC, CEO AND THE SUBSTITUTE FOR PREDECESSOR, MITCH WASDEN, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **7. DEFENDANT:** TALLEY MILLER, MEDICAL RECORDS TECH- IV, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **8. DEFENDANT:** KATHARINE S BUNN, COUSNSEL, **AT:** OFFICE OF THE GENERAL COUNSEL, 227 UNVERSITY HALL COLUMBIA, MO 65211, **9. DEFENDANT:** RONA BIELE, EXECUTIVE STAFF ASSISTANT, GUEST SERVICES REPRESENTATIVE MISSOURI PSHYCHIATRIC CENTER, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **10. DEFENDANT:** MUHAMMAD WAQAR SALAM, MD, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **11. DEFENDANT:** MOHIT BHARDWAJ, MD, UMPC DOCTOR PETITIONER, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **12. DEFENDANT:** SUZANNE M KING, MD, **AT:** ONE HOSPITAL DRIVE,

DC0042.00 COLUMBIA, MO 65212, **13. DEFENDANT:** AMY C BANTZ, SOCIAL WORKER, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **14. DEFENDANT:** ALLEN LAVENDER, RESIDENT, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **15. DEFENDANT:** RUTH E MEYER, RN, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **16. DEFENDANT:** KISTIN E HAHN-COVER, MD, **AT:** ONE HOSPITAL DRIVE DC0042.00 COLUMBIA, MO 65212, **17. DEFENDANT:** JOHN YANOS, MD, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **18. DEFENDANT:** JASON SHOEMAKER, MD, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **19. DEFENDANT:** SETIA SABEENA, MD, **AT:** ONE HOSPITAL DRIVE DC0042.00 COLUMBIA, MO 65212, **20. DEFENDANT:** SHIRLEY J SMITH, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **21. DEFENDANT:** ASHLEY HOLMAN, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **22. DEFENDANT:** PEGGY A FORD, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212, **23. DEFENDANT:** NICOLE E. EPSTEIN, JD, MHA MUHC SYSTEM PRIVACY OFFICER, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

DEFENDANT, MU HEALTH CARE HEREIN REFERRED TO AS (“MUHC”)

AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212

II. MANDAMUS JURISDICTION

THE PLAINTIFF HAS A CLEAR RIGHTS TO CAUSE OF ACTION AND RELIEF,
THE DEFENDANTS’ DUTY BREACHED IS A CLEAR NONDISCRETIONARY
DUTY AND NO OTHER REMEDY IS AVAILABLE THAN

THE 2.5.A. FEDERAL TORT CLAIMS ACT, SEC.1361

THE DEFENDANTS HAS GONE FAR BEYOND ANY RATIONAL EXCISE OF DISCRETION OF OBSERVANCE OF PROCEDURES REQUIRED BY LAW OR OF ANY OBSERVANCE OF THE EQUAL PROTECTION AND THE DUE PROCESS OF LAWS AND RIGHTS;

THE BURDEN IS ON THE (MUHC) A TITLE 42 C.R.F. PART 2, TITLE 18 U.S.C. SEC. 245 AGENCY TO SUSTAIN ITS ACTIONS;

SEE; TITLE 5 U.S.C. 552a (B) (3) (A) NO OTHER REMEDY IS AVAILABLE THAN

THE 2.5B ADMINISTRATIVE PROCEDURE ACT, SEC. 1331

1. THIS COURT HAS JURISDICTION OVER THIS ACTION PURSUANT TO 5 U.S.C. 552a (g) (1), 552 (a) (4) (B), AND 28 U.S.C 1331, 1361, AND;
2. UNDER 5 U.S.C. 552 (a) (3) (A) AND RULE 52; IN SUCH A CASE THE COURT SHALL DETERMINE THE MATTER DE NOVO, AND MAY EXAMINE THE CONTENTS OF ANY (MUHC) AGENCY RECORDS IN CAMERA TO DETERMINE WHETHER THE RECORDS OR ANY PORTION THEREFORE MAY BE WITHHELD...

TITLE 28 U.S.C. 1331 THE FEDERAL QUESTION

JUDICIAL REVIEW OF TITLE 5 U.S.C. 552a RECORDS

THE MUHC TITLE 5 U.S.C. SEC. 552a RECORDS AND THE MUHC ACTIONS ARE WITHOUT PROCEDURE REQUIRED BY LAW AND ARE NOT IN ACCORDANCE WITH LAW AND ARE CONTRARY TO CONSTITUTIONAL RIGHTS;

THE MUHC TITLE 5 U.S.C. SEC. 552a RECORDS AND THE MUHC ACTIONS ARE INVALIDATED BY SUBSTANTIAL EVIDENCE OF THE MUHC LEGAL WRONGS CONTAINED IN MR. REYNOLDS' TITLE 5 U.S.C. SEC. 552a RECORDS THAT ARE IN THE POSSESSION, CUSTODY, OR CONTROL OF THE MUHC, MR. REYNOLDS HAS A LEGAL RIGHT TO OBTAIN THE TITLE 5 U.S.C. SEC. 552a INFORMATION HE SEEKS;

THE MUHC IS ASSERTING JUSTIFICATION FOR THE MUHC MAINTENANCE OF MR. REYNOLDS' TITLE 5 U.S.C. SEC. 552a RECORDS OF **MR. REYNOLDS' TITLE 42 C.F.R. PART 2 IDENTIFYING RECORDS**. SEE; TITLE 5 U.S.C. SEC. 552a, AND TITLE 42 C.F.R. PART 2.13 FOR THE RELEASE, DISCLOSURE AND USE OF **MR. REYNOLDS' PATIENT # 122-88-33-6, IDENTITY PHI AND IHI RECORDS**. THE MUHC HAS DEPRIVED MR. REYNOLDS OF HIS CIVIL RIGHTS OF THE DUE PROCESS AND EQUAL PROTECTION OF LAW. SEE; TITLE 5 USC 552a, TITLE 42 CFR PART 2, TITLE 18 USC 245, TITLE 18 USC SECTION 922 AND PUBLIC LAW 110-180, TITLE 42 U.S.C. 1981, 1983, 1985.

VENUE

3. VENUE IS APPROPRIATE IN THE DISTRICT UNDER 5 U.S.C. 552a (g) (5), 552 (a) (4) (B), AND 28 U.S.C. 1391.

PLAINTIFF REQUEST FOR TRIAL BY JURY

FOR THE AMOUNT IN CONTROVERSY

4. MR. REYNOLDS IS SUFFERING ADVERSE AND HARMFUL AFFECTS,

FROM THE MUHC MAINTENANCE OF TITLE 5 U.S.C. SEC. 552a RECORDS.

5. THE WRONGS ALLEGED IN THIS COMPLAINT ARE ONGOING AND ARE CONTINUING TO OCCUR AT THE PRESENT TIME.
6. THE MUHC HAS CAUSED MR. REYNOLDS TO SUFFER UNJUSTIFIABLE PUNISHMENTS, PAINS AND FINANCIAL HARDSHIPS, INCLUDING, BUT NOT LIMITED TO, MENTAL DISTRESS, EMOTIONAL TRAUMA, EMBARRASSMENT, HUMILIATION AND LOST OR JEOPARDIZED PRESENT OR FUTURE FINANCIAL OPPORTUNITIES. SEE; 5 U.S.C. 552a,
7. THE PLAINTIFF CLAIMS OF THE AMOUNT THE DEFENDANT OWES THE PLAINTIFF OR THE AMOUNT AT STAKE FROM THE PLAINTIFF'S LOSSES IN DAMAGES MORE THAN \$90,000 FROM THE DEFENDANT'S ACTIONS.

III. STATEMENTS OF FACTS OF THE CLAIM

WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY LAW

8. THE MUHC HAS CREATED AND IS MAINTAINING TITLE 5 U.S.C. 552a RECORDS THAT IDENTIFIES **MR. REYNOLDS'** PATIENT # 122-88-33-6 **IDENTITY** OF CASE NUMBER: 11B7-MH000368-01 THE MUHC TITLE 5 U.S.C. SEC. 552a RECORD ON MR. REYNOLDS HIMSELF IS AN TITLE 42 C.F.R. PART 2 AND AN TITLE 18 U.S.C. 245 FEDERALLY PROTECTED RECORDS.
9. THE MUHC IS **ASSERTING JUSTIFICATION** FOR RELEASE, DISCLOSURE AND USE OF **MR. REYNOLDS'** TITLE 42 CFR PART 2 PATIENT # 122-88-33-6 **IDENTITY** AND IDENTIFYING RECORDS CASE NUMBER: 11B7-MH00368-01 AND OF;
10. **MR. REYNOLDS' PROTECTED HEALTHCARE INFORMATION**
11. REFER TO HEREIN AS ("**PHI**") AND

12. MR. REYNOLDS' IDENTIFYING HEALTHCARE INFORMATION
13. REFER TO HEREIN AS ("IHI")
14. THIS IS NOT PERMITTED BY REGULATIONS.
15. THE MUHC IS IDENTIFYING MR. REYNOLDS PATIENT # 122-88-33-6 AS A PERSON WHO HAS BEEN ADJUDICATED AS A MENTAL DEFECTIVE OR WHO HAS BEEN FORMALLY AND INVOLUNTARY COMMITTED TO ANY MENTAL INSTITUTION IN MUHC 5 U.S.C. SEC. 552a RECORDS ON MR. REYNOLDS HIMSELF.
16. THE RECORDS OF MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY IS PROTECTED FROM DISCLOSURE TO THE ATTORNEY GENERAL BY FEDERAL AND STATE LAW AND A STATE COURT ORDER.
17. SEE; TITLE 18 U.S.C. SEC. 922 SEC.102 (C) (iv)
18. THE MUHC HAS VIOLATED A COURT ORDER OF THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI, FROM THE COURT OF JURISDICTION OVER THE MATTER OF **MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY** RECORDS IN CASE NUMBER: 11B7-MH00368-01.
19. **SEE; 290dd-3 (C) (c) PROHIBITION AGAINST USE OF RECORD IN MAKING CRIMINAL CHARGES OR INVESTIGATION OF PATIENT..... NO RECORD REFERRED IN SUBSECTION (a) OF THIS SECTION MAY BE USED TO INITIATE OR SUBSTANTIATE ANY CRIMINAL CHARGES AGAINST A PATIENT OR TO CONDUCT ANY INVESTIGATION OF A PATIENT.**

FIRST CLAIM FOR RELIEF

DEPRIVATION OF FEDERAL RIGHTS UNDER 42 U.S.C. 1983

THE MUHC'S FRAUDULENT DETENTION OF VULNERABLE PERSON

(MR. REYNOLDS) IN THE MUHC'S APRIL OF 2011 RECORDS CONSPIRACIES OF; *"IF A (DOCTOR) SIGNS SOMETHING SAYING THE THAT POLICE CAN GO INTO THE PT'S HOME AND REMOVE WEAPONS,"*

INJURY IN FACT CAUSE OF ACTION

20. THE MUHC'S LIBEL USE MR. REYNOLDS' 42 C.F.R. PART 2 PATIENT DATA RECORDS RESULTING FROM THE MUHC UNLAWFUL ARREST, DETENTION, ABDUCTION OR ANY OTHER FORM DEPRIVATION OF LIBERTY BY AGENT OF THE STATE OR BY PERSONS OR GROUPS OF PERSONS ACTING WITH AUTHORIZATION, SUPPORT OR ACQUIESCENCE OF THE STATE, **FOLLOWED BY A REFUSAL TO ACKNOWLEDGE THE DEPRIVATION OF LIBERTY;**
21. RESULTING FROM MUHC'S TREATMENT TEAMS CONSPIRACIES OF THE ABUSE OF THE LEGAL PROCESS, IN WRONGFUL DETENTION CONFINEMENTS BY ENFORCED DISAPPEARANCE IN MUHC CONSPIRACIES OF THE LIBEL USE OF MR. REYNOLDS' PATIENT 42 C.R.F. PART 2 DATA IN TITLE 5 U.S.C. 552a PUBLIC RECORDS;

SECOND CLAIM FOR RELIEF

MALICIOUS ABUSE OF LEGAL PROCESS UNDER 42 U.S.C. 1983

INJURY IN FACT CAUSE OF ACTION

THE MUHC TITLE 5 U.S.C. SEC. 552a RECORDS IS IMPOSING ADVERSE AND HARMFUL AFFECTS UPON MR. REYNOLDS INCLUDING THE LOSS OF MR. REYNOLDS' FUNDAMENTAL CONSTITUTIONAL RIGHTS WITHOUT THE OBSERVANCE OF PROCEDURES REQUIRED BY LAW.

22. AS A RESULT OF THE MUHC INVASION OF MR. REYNOLDS' PRIVACY
23. AS A RESULT OF THE MUHC CREATION AND MAINTENANCE OF TITLE 5 U.S.C. SEC. 552a RECORDS ON MR. REYNOLDS HIMSELF RECORD IDENTIFIERS: # 11B7-MH00368-01, # 1575967167, # 4-KC-2745811;
24. THE MUHC UNDER COLOR OF LAW HAS DEPRIVED MR. REYNOLDS OF THE DUE PROCESS AND THE EQUAL PROTECTION OF LAWS AND OF THE OBSERVANCES OF PROCEDURES REQUIRED BY LAWS.
25. THE MUHC UNDER COLOR OF LAW HAS VIOLATED MR. REYNOLDS' CONSTITUTIONAL RIGHTS TO THE EQUAL PROTECTION OF LAW;
26. AS A RESULT THE MUHC UNDER THE COLOR OF LAW HAS UNCONSTITUTIONAL DEPRIVED MR. REYNOLDS' RIGHTS OF THE DUE PROCESS AND EQUAL PROTECTION OF LAWS AND CIVIL RIGHTS;
27. SEE; TITLE 42 U.S.C. A290ee-3 (f)
28. AS A RESULT THE MUHC VIOLATIONS PRIVACY ACT TITLE 5 U.S.C. SEC. 552a AND TITLE 42 C.F.R. PART 2, TITLE 18 U.S.C. 245, TITLE 18 U.S.C. SEC. 922, PUBLIC LAW 110-180, TITLE 42 U.S.C. 1981, 1983, 1985; AND;
29. THE MUHC UNAUTHORIZED AND IMPROPER RELEASE, DISCLOSURE AND USE OF PATIENT # 122-33-6 CONFIDENTIAL IDENTITY, THE FBI'S

IS IN VIOLATIONS OF TITLE 42 C.F.R. PART 2; TITLE 42 U.S.C. 1983-THE DEPRIVATION OF RIGHTS, TITLE 18 U.S.C. SEC. 922.

30. AS A RESULT THE MUHC HAS UNLAWFUL DEPRIVED MR. REYNOLDS PATIENT # 122-88-33-6 OF HIS CONSTITUTIONAL RIGHTS;

THIRD CLAIM FOR RELIEF

THE MUHC HAS DEPRIVED MR. REYNOLDS OF HIS FIRST, SECOND, THIRD, FOURTH, FIFTH, SIXTH, EIGHTH AND FOURTEENTH CONSTITUTIONAL RIGHTS, AND OTHERS;

INJURY IN FACT CAUSE OF ACTION

THE MUHC'S CREATION OF TITLE 5 U.S.C. 552a IDENTIFIABLE RECORD OF (MR. REYNOLDS') TITLE 42 C.R.F. PART 2 PATIENT IDENTITY DATA

31. ***PLAINTIFF IS SUFFERING ONGOING LEGAL WRONGS BECAUSE OF;***
THE MUHC AGENCY ACTIONS, OF THE CREATION OF A TITLE 5 U.S.C. 552a
RECORD OF (MR. REYNOLDS') TITLE 42 C.R.F. PART 2 RECORDS,
AND MUHC'S BREACH OF (MR. REYNOLDS') IDENTITY, DIAGNOSIS,
PROGNOSIS, OR TREATMENT) OF CONFIDENTIALITY OF PATIENT A290dd-3
RECORD

RESULTING FROM MUHC'S GROSS NEGLIGENCE OF
THE STANDARDS OF PATIENT CARE REQUIRED BY LAW

RESULTING FROM THE MUHC'S FAILURES TO PROTECT PRIVACY RIGHTS
OF S.S.A. DISABLED WORKERS' COMPENSATION, PATIENT

MARK P REYNOLDS 9560 STATE RD O STEEDMAN, MO 65077

DIVISION OF WORKERS' COMPENSATION

INSURANCE NO: 0187309 10567

INJURY NO: 08-85172 INJURY DATE: 09-15-2008

*THE EXAMPLE DHSS ATTORNEY GAVE MR. REYNOLDS: A MEDICAL RECORD,
IS A MEDICAL RECORD, WHEREEVER IT ENDS UP,
IT IS A MEDICAL RECORD MADE BY A DOCTOR.*

FOURTH CLAIM FOR RELIEF

AS A RESULT OF (MUHC) (OR ITS ASSOCIATES/EMPLOYEES) IN DIRECT
VIOLATIONS OF CRM 1872, TITLE 42 CRF PART 2 IN TITLE 18 U.S.C. 241
CONSPIRACIES AGAINST MR.REYNOLDS' RIGHTS;

INJURY IN FACT CAUSE OF ACTION

MUHC'S ACTS AND ACTIONS OF FURTHANCE OF

OBJECT OF SUCH CONSPIRACY

THIS ACTION SEEKS REDRESS FOR THE COORDINATED AND
CONCENTRATED EFFORTS;

CONSPIRED BY: SUZANNE M KING MD

CONSPIRED BY: MOHIT BHARDWAJ, MD, MUPC DOCTOR PETITIONER

**CONSPIRED BY: AMY C BANTZ SOCIAL WORKER, AND OTHER MUPC
TREATMENT TEAM MEMBERS**

SEE; MU HEALTH CARE RECORD RELEASED ON 5/16/2019

**PAGE 50, 166, 167, 168 OF 174, AND OTHER MUHC TREATMENT TEAM LAW
ENFORCEMENT REGULATORY SCHEME PARTICIPATES IN ACTS IN
FURTHERANCES OF THE OBJECTS OF SUCH CONSPIRACY, WHEREBY
ANOTHER IS INJURED IN HIS PERSON OR PROPERTY, OR **DEPRIVED OF
HAVING AND EXCISING ANY RIGHT OR PRIVILEGE OF A CITIZEN OF
THE UNITED STATES**,**

FIFTH CLAIM FOR RELIEF

UNLAWFUL 42 U.S.C. A290dd-3 INVESTIGATIONS

INJURY IN FACT CAUSE OF ACTION

32. MR. REYNOLDS REPEATS AND REALLEGES THE ALLEGATIONS
CONTAINED IN PARAGRAPHS 1 THROUGH 31 ABOVE, INCLUSIVE.

THE MUHC IS MAINTAINING PROHIBITED TITLE 5 U.S.C. SEC. 552a RECORDS
OF THE MUHC UNLAWFUL BREACH OF THE CONFIDENTIALITY OF AN
ALCOHOL AND DRUG ABUSE PATIENT IDENTITY AND MR. REYNOLDS HAS
BEEN HARMFULLY INJURED BY THE MUHC UNLAWFUL TITLE 42 U.S.C.

A290dd-3 (f) INVESTIGATIONS AND THE MUHC PROHIBITED USE AND MAINTENANCE OF MR. REYNOLDS' TITLE 5 U.S.C. SEC. 552a RECORDS OF PATIENT # 122-88-33-6 IDENTITIES WITHOUT THE MUHC OBSERVANCE OF PROCEDURE REQUIRED BY LAW,

33. THERE IS NO LAWFUL REASON FOR THE MUHC TO RETAIN ANY TITLE 5 U.S.C. SEC. 552a RECORDS OF MR. REYNOLDS' IDENTITIES OR OF MR. REYNOLDS' IDENTIFYING INFORMATION WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY LAWS.

THE MUHC IS MAINTAINING PROHIBITED TITLE 5 U.S.C. SEC. 552a RECORDS AS A RESULT OF THE MUHC UNLAWFUL TITLE 42 U.S.C. A290dd-3 (f) INVESTIGATIONS CONDUCTED BY MUHC AGENTS UNDER COLOR OF LAW OF MR. REYNOLDS AS A PARTICIPANT IN A TITLE 42 C.F.R. PART 2 COVER PROGRAMS.

SIXTH CLAIM FOR RELIEF

VIOLATION OF DUE PROCESS 42 U.S.C. 1983, 42 C.F.R. PART 2,

42 U.S.C. 290dd-3 CONFIDENTIALITY OF PATIENT RECORDS

THE MUHC UNDER COLOR OF LAW HAS DEPRIVED MR. REYNOLDS OF THE EQUAL PROTECTIONS AND THE DUE PROCESS OF LAWS.

TITLE 42 U.S.C. 1985 (3) DEPRIVING PERSONS OF RIGHTS OR PRIVILEGES....OR DEPRIVED OF HAVING AND EXERCISING ANY RIGHT OR PRIVILEGE OF A CITIZEN OF THE UNITED STATES;

INJURY IN FACT CAUSE OF ACTION

34. THE MUHC CREATION AND MAINTENANCE OF MUHC TITLE 5 U.S.C. SEC. 552a RECORDS, CONTAINING RECORDS OF THE MUHC RELEASE, DISCLOSURE AND USE OF MR. REYNOLDS' PHI AND IHI RECORD IDENTIFYING MR. REYNOLDS AS IN RECORD 11B7-MH00368-01 WITHOUT DUE PROCESS OF LAW TITLE 42 C.F.R. PART 2, IS PROHIBITED BY LAW, SEE FBI FILE: # 4-KC-2745811 # 1575967167,

THE MUHC EMPLOYEES KNEW OR SHOULD HAVE KNOWN THEIR ACTIONS WERE IMPROPER AND UNLAWFUL, IN THE MUHC UNLAWFUL MAINTENANCE OF PROHIBITED TITLE 5 U.S.C. SEC. 552a RECORDS AS A RESULT OF THE MUHC UNLAWFUL TITLE 42 U.S.C. A290dd-3 (f) INVESTIGATIONS CONDUCTED BY MUHC AGENTS UNDER COLOR OF LAW OF MR. REYNOLDS PATIENT # 122-88-33-6, AS A PARTICIPANT IN A TITLE 42 C.F.R. PART 2 COVER PROGRAMS AND THE MUHC PRIVACY ACT-IMPROPER DISSEMINATION OF TITLE 5 U.S.C. SEC. 552a RECORDS CONSTITUTES TO BE AN MUHC INVASION OF MR. REYNOLDS' PRIVACY.

SEVENTH CLAIM FOR RELIEF

THE MUHC TITLE 5 U.S.C. SEC. 552a RECORDS ARE UNCONSTITUTIONAL
THE MUHC UNDER COLOR OF LAW WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY LAW HAS DEPRIVED MR. REYNOLDS OF HIS RIGHTS AND PRIVILEGES OF A CITIZEN OF THE UNITED STATES AND THE

MUHC TITLE 5 U.S.C. SEC. 552a RECORDS IS IMPOSING CRUEL AND UNUSUAL PAINS AND PUNISHMENTS AND ADVERSE, HARMFUL AFFECTS UPON MR. REYNOLDS FOR HIS PARTICIPATION IN A FEDERAL ASSISTED PROGRAM.

EIGHTH CLAIM FOR RELIEF

35. THE MUHC VIOLATIONS OF MR. REYNOLDS' RIGHTS OF THE FIRST, SECOND, THIRD, FOURTH, FIFTH, SIXTH, EIGHTH AND FOURTEENTH ADMENDENTS OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA AND THE MUHC VIOLATIONS OF 42 U.S.C. A290ee-3(2) (c), 42 U.S.C. A290dd-3(2) (c) AND 42 C.F.R. A2.61 et. Seq. CONSTITUTES TO BE AN INVASION OF MR. REYNOLDS' PRIVACY, BY THE MUHC.

THE MUHC EMPLOYEES KNEW OR SHOULD HAVE KNOWN THEIR ACTIONS WERE IMPROPER AND UNLAWFUL;

AS A RESULT OF THE MUHC UNLAWFUL TITLE 42 U.S.C. A290dd-3 (f) INVESTIGATIONS OF MR. REYNOLDS PATIENT # 122-88-33-6, CONDUCTED BY MUHC AGENTS UNDER COLOR OF LAW OF 42 C.F.R PART 2

INJURY IN FACT CAUSE OF ACTION

THE MUHC DUTY BREACHED IS A CLEAR NONDISCRETIONARY DUTY

OF FEDERALLY PROTECTED ACTIVITIES;

SEE; TITLE 5 U.S.C. SEC. 552a (e) (6).

THE MUHC FAILED TO MAKE REASONABLE EFFORTS TO ENSURE THAT THE INFORMATION AND RECORDS WERE ACCURATE, COMPLETE, TIMELY AND RELEVANT FOR AGENCY PURPOSES IN VIOLATION OF;

SEE; TITLE 42 C.F.R. PART 2 AND TITLE 18 U.S.C. 245 (2) (b) (1) (E)

NINTH CLAIM FOR RELIEF

TITLE 5 U.S.C. SEC. 552a (PRIVACY ACT- IMPROPER DISSEMINATION)

WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY LAW

SEE; NTEU v. IRS, 601 F. SUPP. 1268, 1272 (D.D.C. 1985)

THE MUHC IS PROHIBITED BY 42 C.F.R. PART 2 PRIOR TO THE DISSEMINATING OF THE INFORMATION AND THE INFORMATION RECORDS RELATED TO MR. REYNOLDS,

INJURY IN FACT CAUSE OF ACTION

36. MUHC EMPLOYEES HAS CONSPIRED IN THE UNJUSTIFIABLE MANIPULATIONS OF TITLE 5 U.S.C. SEC. 552a RECORDS OF PATIENT'S TITLE 42 C.F.R. PART 2 IDENTITIES RECORDS. SEE; TITLE 18 U.S.C. 245,
37. THE MUHC HAS KNOWINGLY AND WILLFULLY CREATED AND IS MAINTAINING TITLE 5 U.S.C. SEC. 552a, RECORDS OF **MR. REYNOLDS'** IDENTIFYING INFORMATION AS A PARTICIPANT IN A 42 C.F.R. PART 2 COVERED PROGRAMS.
38. ***THE MUHC FAILED TO SATISFY THE REQUIREMENTS OF LAW AND; APPROPRIATE CONSTITUTIONAL SAFEGAURDS THAT ARE IN PLACE.***

BEFORE;

39. THE MUHC RELEASE, DISCLOSURE AND USE OF MR. REYNOLDS' (PHI) AND (IHI) PATIENT # 122-88-33-6 IDENTITY CASE RECORD IDENTIFIERS: # 11B7-MH00368-01.

TENTH CLAIM FOR RELIEF

THE CONNECTION BETWEEN THE INJURY AND MUHC AGENCY

ACTIONS OF MUHC'S DETENTION RECORDS CONSPIRACIES

MUHC PRODUCTION OF PATIENT'S 565.184 RSMO

FRAUDULENT BAD DEBTS

INJURY IN FACT CAUSE FOR ACTION

THE CONNECTION TO MR. REYNOLDS' INJURIES RESULTING FROM MUHC'S 42 C.R.F. PART 2 DETENTION RECORDS CONSPIRACIES IS THE MUHC 565.184 RSMO FRAUDULENT BAD DEBTS MUHC PATIENT'S ACCOUNT # 1158911 IN THE AMOUNT OF \$20395.92 UNITED STATES DOLLARS OF RSMO 565.184 BAD DEBTS UPON (MR. REYNOLDS) MEDICARE ACCOUNT.

AS EVIDENCE OF TRUTH IN MUHC'S DEFAMATIONS ACTIONS

SEE; CONSTITUTION OF MISSOURI ART I SEC. 8

BY MUHC'S PERSONS INCOMPETENT TO TESTIFY RSMO 491.060 (5)

A PHYSICIAN LICENSED PURSUANT TO CHAPTER 334,.....

IN LIBEL HARASSMENT PUBLIC RECORDS PUBLICATIONS DEFAMING
DISABLED RELIGIOUS PERSON MARK PAUL REYNOLDS CHARACTER
RESULTING FROM UNLAWFUL CRM 1872 TITLE 42 U.S.C. A290ee-3
INVESTIGATIONS IN TITLE 18 U.S.C. 241 CONSPIRACY AGAINST RIGHTS;

ELEVENTH CLAIM FOR RELIEF

42 U.S.C. 1988-PROCEEDINGS FOR THE VINDICATION OF

MR. REYNOLDS' CIVIL RIGHTS,

PLAINTIFF IS SEEKING RELIEF FROM HIS INJURIES OF THE MUHC'S
DEFINITIVE PATTERNS AND PRACTICES OF PREJUDICES OF
HARRASSMENTS WITH ABUSE OF LEGAL PROCESS WRONGFUL DETENTION
CONFINEMENTS;

THE PLAINTIFF IS SEEKING RELIEF OTHER THAN

JUST MONEY DAMAGES

FOR THESE FORMAL PROCEEDINGS ARE TO ENFORCE PROVISIONS OF
CIVIL RIGHTS ACT OF 1866 P.L. 14 SAT. 27-30 & CIVIL RIGHTS ACT OF 1991
SEC 1981 P.L. 102-166 THE ACT GUARANTEED TO ALL CITIZENS THE FULL
AND EQUAL BENEFIT OF ALL LAWS AND PROCEEDINGS FOR **THE**
SECURITY OF PERSON AND PROPERTY; THE ACT PROTECTS ALL
PERSONS CIVIL RIGHTS AND **FURNISH THE MEANS OF VINDICATION;**

THE FOURTEENTH AMENDMENT EQUAL PROTECTION CLAUSE, AND THE ACT OF 1866 GUARANTEED TO ALL CITIZENS LIKE PUNISHMENTS, PAINS, PENALTIES AND TAXES, EXACTIONS OF EVERY KIND AND TO NO OTHER.

INJURY IN FACT CAUSE OF ACTION

PLAINTIFF CLAIMS THE NEED FOR JUDICIAL DECLARATORY, INJUNCTIVE AND EXPUNGEMENT RELIEF FROM HIS INJURIES;

IN THE MUHC'S ARBITRARY, CAPRICIOUS, UNCONSTITUTIONAL DEPRIVATIONS OF WORKERS' COMPENSATION, S.S.A. DISABLED PATIENT'S PRIVACY RIGHTS, CIVIL LIBERTIES AND CIVIL RIGHTS SECURED TO THE PATIENT BY THE CONSTITUTION OF THE UNITED STATES OF AMERICA AND SECURED BY THE CONSTITUTION OF THE STATE OF MISSOURI.

RESULTING FROM MUHC (OR ITS ASSOCIATES/EMPLOYEES) CONSPIRACIES OF THE ABUSE OF LEGAL PROCESS IN THE LIBEL FALSE IMPRISONMENTS OR WRONGFUL DETENTION CONFINEMENTS

BY THE FORCE DISAPPEARANCE

IN MUHC'S FRAUDULENT DETENTION OF MR. REYNOLDS;

MUHC HAS CLASSIFIED MR.REYNOLDS AS AN "SUBHUMAN CLASS" OF U.S.A CITIZEN (A "UNTERMENCH GRADE")

IN MUHC'S UNLAWFUL TITLE 42 U.S.C. A2900ee-3INVESTIGATION OF:

MARK PAUL REYNOLDS UNDER COLOR OF LAW

IN ABUSE OF LEGAL PROCESS WRONGFUL DETENTION CONFINEMENTS

WITH PREJUDICES

TO DISFRANCHISE, TO DEPRIVE THE UNTERMENSCHEN CLASS OF RIGHTS
AND PRIVILEGES OF A FREE CITIZENS;

TWELFTH CLAIM FOR RELIEF

*IN THE MUHC'S DISCRIMINATORY UNCONSTITUTIONAL
CLASSIFICATIONS OF THE UNITED STATES OF AMERICA HUMAN
POPULATIONS AND IN THE DENUNCIATION OF THE UNTERMENSCHEN
(SUB-HUMANS) CITIZENS OF AMERICA RESULTING FROM THE MUHC'S
TITLE 5 U.S.C. 552a RECORDS CONSPIRACIES OF THE UNCONSTITUTIONAL
FERAL CLASSIFICATIONS OF THE UNITED STATES OF AMERICA HUMAN
POPULATIONS;*

IF TWO OR MORE PERSONS IN ANY TERRITORY CONSPIRE..... FOR THE
PURPOSE OF DEPRIVING, EITHER DIRECTLY OR INDIRECTLY, ANY PERSON
OR CLASS OF PERSONS OF THE EQUAL PROTECTION OF THE LAWS, OR
EQUAL PRIVILEGES AND IMMUNITIES UNDER LAW;

“THE CIVIL RIGHTS ACT OF (1866)” BAN STATES AND THE STATES’
POLICE POWER FROM BARRING MR. REYNOLDS AS A [CERTAIN CLASS OF
PEOPLE OR PERSONS] PROHIBITING THEM FROM OWNING FIREARMS.

UNITED STATES VS NICHOLS 841 (1988) FORBIDS STATES FROM DEPRIVING MR. REYNOLDS AS A [CERTAIN CLASS OF PEOPLE OR PERSONS] OF PROPERTY WITHOUT DUE PROCESS OF LAW.

UNITED STATES VS NICHOLS 841 F.2D 1485, 1510 N. 1 (10TH CIR. 1988)

A CITIZEN OF ANY STATE OF THE UNION BY A BONA FIDE RESIDENCE THEREIN, WITH THE SAME RIGHTS AS OTHER CITIZENS OF THAT STATE SEE; SLAUGHTER-HOUSE CASES (1873)

PLAINTIFF SEEKS RELIEF FROM INJURIES IN FACT OF THE MUHC LIBEL USE OF MR. REYNOLDS' PROTECTED HEALTH CARE INFORMATION IN VIOLATIONS MR. REYNOLDS' CIVIL RIGHTS IN PUBLIC RECORDS; IN THE MUHC'S VIOLATIONS OF MR. REYNOLDS' CIVIL RIGHTS AS SAID RIGHTS ARE SECURED BY SAID STATUTES AND CONSTITUTIONS OF THE STATE OF MISSOURI AND THE UNITED STATES.

THIRTEEN CLAIM FOR RELIEF

ELEMENTS LIBEL FALSE IMPRISONMENT UNDER 42 U.S.C. 1983

THE MUHC'S WILLFUL, UNLAWFUL, ENFORCE DISAPPEARANCE DETENTION

OF MR. REYNOLDS WITHOUT HIS CONSENT,

INJURY IN FACT CAUSE FOR ACTION

MUHC IS MAINTAINING UNLAWFUL 5 U.S.C. 552a (e) (7) RECORDS

IN THE MUHC'S RECORDS CONSPIRACIES OF THE FRAUDULENT
DETENTION OF MR. REYNOLDS';

FOURTEENTH CLAIM FOR RELIEF

5 U.S.C. 552a (b) (6)

*MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS WERE MADE **FRAUDULENTLY**
WITHOUT OBSERVANCES OF PROCEDURES REQUIRED BY LAWS.*

INJURY IN FACT CAUSE OF ACTION

WHILE MR. REYNOLDS UNDER LEGAL DISABILITY OF IMPRISONMENT

IN THE MUHC'S **FRAUDULENT DETENTION** OF MR. REYNOLDS

MUHC IS MAINTAINING OF UNLAWFUL 5 U.S.C. 552a (e) (7) RECORDS

IN MUHC'S COMMUNIST TREATMENT OF MR. REYNOLDS'

CATHOLIC RELIGION INFECTION *SEE; RSMO 491.060 (4), 630.180*

THE MUHC IMPRISONED MR. REYNOLDS FOR MR. REYNOLDS' FREE
EXERCISE OR SEEKING TO EXERCISE AND ENJOYMENT OF RIGHTS AND
PRIVILEGES AS A CITIZEN OF THE UNITED STATES AT A PLACE WORSHIP.

FIFTHTEENTH CLAIM FOR RELIEF

42 U.S.C. A290ee-3 INVESTIGATIONS OF MARK PAUL REYNOLDS

THE SAID INJURIES IN FACT OF THE MUHC'S UNLAWFUL RECORDS

CONSPIRACIES RESULTING MUHC'S HARASSMENTS IN THE FRAUDULENT

LIBEL USE OF PUBLIC RECORDS,

IN VIOLATIONS LAW, MO.COR 4.24, RSMO 610.120, 5 U.S.C. 552a

INJURY IN FACT CAUSE OF ACTION

SEE; 42 U.S.C. 1983-CIVIL ACTIONS FOR DEPRIVATION OF RIGHTS

WITHOUT OBSERVANCE OF PROCEDURE REQUIRED BY LAW

MR. REYNOLDS HAS SUFFERED ADVERSE HARMFUL AFFECTS WITH PERSONAL INJURY AND LOSS OF PROPERTY BY REASON OF THE MUHC WRONGFUL RECKLESS MALICIOUS CONDUCT IN THE MUHC WRONGFUL CREATION AND MAINTENANCE OF TITLE 5 U.S.C. SEC. 552a, 42 C.R.F.PART 2 RECORDS.

RECORDS MEANS; ANY INFORMATION WHETHER RECORDED OR NOT, RELATING TO A PATIENT *RECEIVED OR ACQUIRED BY A FEDERALLY ASSISTED ALCOHOL OR DRUG PROGRAM.*

DISCLOSE OR DISCLOSURE MEANS; A COMMUNICATION OF PATIENT IDENTIFYING INFORMATION, THE AFFIRMATION VERIFICATION OF ANOTHER PERSON'S COMMUNICATION OF PATIENT IDENTIFYING INFORMATION, OR THE COMMUNICATION OF ANY INFORMATION FROM THE RECORD OF A PATIENT WHO HAS BEEN IDENTIFIED.

DIAGNOSIS MEANS; ANY REFERENCE TO AN INDIVIDUAL'S ALCOHOL OR DRUG ABUSE OR *TO A CONDITION WHICH IS IDENTIFIED AS HAVING BEEN CAUSED BY THAT ABUSE WHICH IS MADE FOR THE PURPOSE OF TREATMENT OR REFERRAL FOR TREATMENT.*

PATIENT MEANS; ANY INDIVIDUAL WHO HAS APPLIED FOR OR BEEN GIVEN DIAGNOSIS OR TREATMENT FOR ALCOHOL OR DRUG ABUSE AT A FEDERALLY ASSISTED PROGRAM AND INCLUDES ANY INDIVIDUAL WHO, AFTER ARREST ON A CRIMINAL CHARGE, *IS IDENTIFIED AS ALCOHOL OR DRUG ABUSER IN ORDER TO DETERMINE THAT INDIVIDUAL'S ELIGIBILITY TO PARTICIPATE IN A PROGRAM.*

PATIENT IDENTIFYING INFORMATION MEANS; THE NAME, ADDRESS, SOCIAL SECURITY NUMBER, FINGERPRINTS, PHOTOGRAPH, OR SIMILAR INFORMATION BY WHICH THE IDENTITY OF A PATIENT CAN BE DETERMINED WITH REASONABLE ACCURACY AND SPEED EITHER DIRECTLY OR BY REFERENCE TO OTHER PUBLICLY AVAILABLE INFORMATION. THE TERM DOES NOT INCLUDE A NUMBER ASSIGNED TO A

PATIENT BY A PROGRAM, IF THAT NUMBER DOES NOT CONSIST OF, OR CONTAIN NUMBERS (SUCH A SOCIAL SECURITY, OR DRIVER'S LICENSE NUMBER)

WHICH COULD BE USED TO IDENTIFY A PATIENT WITH REASONABLE ACCURACY AND SPEED FROM SOURCES EXTERNAL TO THE PROGRAM.

PERSON MEANS; AN INDIVIDUAL, ANY NATURAL PERSON, PARTNERSHIP, CORPORATION, COMPANY, PARTNERSHIP, JOINT VENTURE, FIRM, ASSOCIATION, PROPRIETORSHIP, AGENCY, BOARD, AUTHORITY, STATE, OR LOCAL GOVERNMENT AGENCY, COMMISSION, OFFICE, OR OTHER BUSINESS, FEDERAL, OR ANY OTHER LEGAL ENTITY, WHETHER PRIVATE OR GOVERNMENTAL.

CLAIM FOR RELIEF

TITLE 42 U.S.C. 1981- EQUAL RIGHTS UNDER THE LAW

TITLE 5 U.S.C. SEC. 552a (PRIVACY ACT-IMPROPER DISSEMINATION)

THE CONNECTION BETWEEN THE INJURY AND

MUHC AGENCY ACTIONS

INJURY IN FACT CAUSE OF ACTION

THE INJURIES IN FACT CAUSED FROM THE MUHC ACTIONS GOES FAR BEYOND ANY RATIONAL EXERCISE OF DISCRETION OF THE OBSERVANCE OF PROCEDURES REQUIRED BY LAW AND THE MUHC ACTIONS AS GONE FAR BEYOND ANY RATIONAL EXERCISE OF DISCRETION OF THE EQUAL PROTECTION AND THE DUE PROCESS OF LAWS AND RIGHTS.

40. THE MUHC VIOLATED TITLE 42 C.F.R. PART 2.13 CONFIDENTIALITY RESTRICTIONS (a) (b) (c)OR ASSERTS ANY OTHER JUSTIFICATION FOR A DISCLOSURE OR USE WHICH IS NOT PERMITTED BY THESE REGULATIONS.

41. ANY AND ALL MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY RECORDS AND ANY RECORDS OF ADJUDICATIONS IN CASE NO: 11B7-MH00368-01, IS A TITLE 42 C.F.R. PART 2 RECORD RECEIVED OR ACQUIRED BY FEDERALLY ASSISTED ALCOHOL OR DRUG PROGRAM. WHICH IS MADE FOR THE PURPOSE OF TREATMENT OR REFERRAL FOR TREATMENT WITHOUT A COURT ORDER USE IS PROHIBITED BY FEDERAL LAW.

THE JUDICIAL PROCEEDINGS WHICH WERE MADE FOR THE PURPOSE OF TREATMENT OR REFERRAL TREATMENT DO NOT SATISFY THE REQUIREMENTS OF LAWS FOR THE IMPOSITION OF MR. REYNOLDS' NIAA FEDERAL FIREARMS DISABILITIES. SEE; PUBLIC LAW 110-180;

PLAINTIFF IS SEEKING JUDICIAL DECLARATORY, INJUNCTIVE AND EXPUNGEMENT RELIEF FROM THE RECORDS OF THE MUHC'S CONSPIRACIES OF THE UNCONSTITUTIONAL AND THE UNLAWFUL, VIOLATIONS MR. REYNOLDS PATIENT'S PRIVACY RIGHTS, CIVIL LIBERTIES AND CIVIL RIGHTS;

42. JUDICIAL REVIEW OF TITLE 5 U.S.C. SEC. 552a RECORDS IS LIKELY TO BRING RELIEF WITH EXPUNGEMENT OF THE MUHC TITLE 5 U.S.C. SEC. 552a RECORDS AND THEIR ADVERSE AND HARMFUL AFFECT UPON MR. REYNOLDS AS A RESULT OF THE MUHC UNLAWFUL USE OF TITLE 5 U.S.C. SEC. 552a RECORDS WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY LAW, THAT IS CONTINUING TO CAUSE MR. REYNOLDS TO SUFFER PUNISHMENTS, PAINS AND FINANCIAL HARDSHIPS.

43. MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY RECORDS AND SIMILAR INFORMATION CANNOT BE RELEASED TO LAW ENFORCEMENT UNTIL A COURT ORDER HAS BEEN OBTAINED BY OFFICERS AUTHORIZING SUCH RELEASE. SEE; TITLE 42 C.F.R. PART 2

44. IN VIOLATIONS OF THE CONFIDENTIALITY OF PATIENT RECORDS.

SEE; 42 U.S.C. A290ee-3, 42 U.S.C. A290dd-3 AND;

SEE; 42 C.F.R. A2, CRIMINAL RESOURCE MANUAL 1872.

SEE 42 U.S.C. A290ee-3 (2) (c), 42 U.S.C. 290dd-3 (2) (c), AND 42 C.F.R. A2

THE RECORDS OF **MR. REYNOLDS'** PATIENT # 122-88-33-6 **IDENTITIES** FOR UNDERGOING TREATMENT FOR DRUG OR ALCOHOL ABUSE ARE CONFIDENTIAL. SEE; 42 U.S.C. A290ee-3 AND 42 U.S.C. A290dd-3 AND 42 C.F.R. A2

44. SEE; UNITED STATES V. GRAHAM, 548 F.2d 1302, 1314 (8TH CIR. 1977)

45. REGARDING THE STRICT MANNER IN WHICH THE CONFIDENTIALITY REQUIREMENTS ARE CONSTRUED,

46. ***SEE; TITLE 42 CFR (PART 2) THE PRESENCE OF PATIENTS:***

47. *AND 2.13 (A) ...MAY NOT OTHERWISE BE DISCLOSED OR USED IN ANY CIVIL, CRIMINAL, ADMINISTRATIVE, OR LEGISLATIVE PROCEEDINGS CONDUCTED BY ANY FEDERAL, STATE, OR LOCAL AUTHORITY...; AND (b) UNCONDITIONAL COMPLIANCE REQUIRED: (C) ACKNOWLEDGING*

SEE; 610.120, 610.200 AND 610.025 RSMO SHALL PUBLISH REGULATIONS GOVERNING THE SECURITY AND PRIVACY OF THE RESPOSITORY OF CRIMINAL HISTORY RECORDS, AS REQUIRED BY THIS STATE AND BY FEDERAL LAW OR REGULATION

THE REMOVAL OF A RIGHT PREVIOUSLY ENJOYED IS PUNISHMENT AND IS THE CLEAREST PROOF OF THE CIVIL REGULATORY SCHEME'S PUNITIVE EFFECT. IS CONTRAY CALDER VS BULL (1798)

48. JUDICIAL REVIEW OF TITLE 5 U.S.C. SEC. 552a RECORDS IS LIKELY TO BRING RELIEF WITH THE EXPUNGEMENT OF THE MUHC'S TITLE 5 U.S.C. 552a RECORDS AND THEIR ADVERSE AND HARMFUL AFFECTS UPON MR. REYNOLDS AS A RESULT OF THE MUHC'S UNLAWFUL, REFUSALS AND FAILURES TO OBSERVER PROCEDURES REQUIRED BY LAW THAT WERE DESIGNED TO PROTECT PATIENT # 122-88-33-6 AND; THE MUHC IS INTENTIONALLY AND WILLFULLY MAINTAINING UNJUSTIFIABLE MUHC TITLE 5 U.S.C. 552a RECORDS PROHIBITED BY LAW OF MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY, PHI AND IHI AND PATIENT CASE RECORD IDENTIFIERS: # 11B7-MH00368-01.

49. JUDICIAL REVIEW OF TITLE 5 U.S.C. SEC. 552a RECORDS IS LIKELY TO BRING RELIEF WITH THE EXPUNGEMENT OF THE MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS AND THEIR ADVERSE AND HARMFUL AFFECTS UPON MR. REYNOLDS UNDER ARBITRARY AND CAPRICIOUS STANDARD OF REVIEW;
50. **SEE; TITLE 5 U.S.C. 552a (B) (3) (A)**

THE BURDEN IS ON THE (MUHC) AGENCY TO SUSTAIN ITS ACTIONS

THE MUHC MUST ARTICULATE A SATISFACTORY EXPLANATION FOR ITS ACTIONS INCLUDING A RATIONAL CONNECTION BETWEEN THE DATA (THE FACTS) THE MUHC REVIEWED AND (THE FACTS OF THE MUHC'S ACTIONS) IN THE MAINTENANCE OF TITLE 5 U.S.C. 552a RECORDS, THERE WAS NO JUDICIAL PROCEEDINGS (NO HEARINGS);

- WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY TITLE 42 U.S.C. A290ee-3 AND TITLE 42 U.S.C. A290dd-3, TITLE 18 U.S.C. 245, TITLE 42 CFR A2, TITLE 5 U.S.C. SEC. 552a.
- WITHOUT THE EQUAL PROTECTION OF LAW AND THE DUE PROCESS OF LAW.

THEREFORE; THERE IS NO RECORDS OF THE JUDICIAL PRODEDURES REQUIRED BY LAW FOR THE MUHC'S LEGAL RELEASE, DISCLOSURE AND USE OF MR. REYNOLDS' TITLE 42 PART 2 PATIENT # 122-88-33-6, IDENTITY, PHI AND IHI AND IDENTIFIABLE RECORDS AS IN CASE: # 11B7-MH00368-01 AND THERE WAS NO JUDICIAL PROCEEDINGS;

- WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY PUBLIC LAW 110-180 (c) STANDARD FOR ADJUDICATIONS AND COMMITMENTS RELATED TO MENTAL HEALTH,
 - WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY TITLE 18 U.S.C. SEC. 922, WITHOUT THE EQUAL PROTECTION OF LAW AND THE DUE PROCESS OF LAW. (NO HEARINGS) THEREFORE; MR. REYNOLDS HAS BEEN INJURED BY THE MUHC'S ACTIONS AND THE MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS THAT ARE INVALIDITED UNDER ARBITRARY AND CAPRICIOUS STANDARD OF REVIEW,
 - THERE IS NO MUHC RECORDS OF THE JUDICIAL PROCEDURES REQUIRED BY LAW FOR THE LEGAL IMPOSITION OF MR. REYNOLDS' (NIAA FEDERAL FIREARMS DISABILITIES)
51. JUDICIAL REVIEW OF TITLE 5 U.S.C. SEC. 552a RECORDS ARE LIKELY TO BRING RELIEF WITH THE EXPUNGEMENT OF THE MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS AND THEIR ADVERSE AND HARMFUL AFFECT UPON MR. REYNOLDS BY THE MUHC'S MAINTENANCE OF TITLE 5 U.S.C. SEC 552a RECORDS THAT HAS DEPRIVED MR. REYNOLDS OF RIGHTS, PRIVILEGES, OR IMMUNITIES SECURED BY THE CONSTITUTION OF THE UNITED STATES OF AMERICA; AND TO THE LIABILITIES THAT THE MUHC IS SUBJECTED TO UNDER TITLE 5 U.S.C. SEC. 552a (g), TITLE 42 C.F.R. PART 2, TITLE 18 U.S.C. 245, TITLE 42 U.S.C. 1981, 1983, 1985.

(FTCA) CLAIM FOR MONETARY DAMAGES

IN THE SUM OF \$10 MILLION FOR IRREPARABLE HARMS CAUSED BY
THE MUHC'S RETALIATORY, PUNITIVE, ARBITRARY AND CAPRICIOUS
FRAUDULENT ACTS AND ACTIONS

AGAINST A PATIENT FOR HIS PARTICIPATION IN FEDERALLY ASSISTED
PROGRAMS SEE; TITLE 18 U.S.C. SEC. 245, TITLE 42 C.R.F. PART 2

FEDERALLY PROTECTED ACTIVES;

SEE; TITLE 42 CFR PART 2; CRM 1872 CRIMINAL OFFENSES

SEE; UNITED STATES V. GRAHAM, 548 F. 2d 1302-8TH CIRCUIT 1977 1314, 1315

IN THE MUHC'S TITLE 42 U.S.C. 1985 CONSPIRACY TO INTERFERE WITH MR.
REYNOLDS CIVIL RIGHTS, **FOR MR. REYNOLDS' FREE EXERCISE OR
SEEKING TO EXERCISE AND ENJOYMENT OF RIGHTS AND PRIVILEGES
AS A CITIZEN OF THE UNITED STATES.**

MR. REYNOLDS CLAIMS THE NEED FOR MONETARY DAMAGES IN THE SUM
OF \$10 MILLION UNITED STATES DOLLARS FOR THE MUHC'S ARBITRARILY,
CAPRICIOUSLY AND UNCONSTITUTIONAL DEPRIVATIONS OF;

**MR. REYNOLDS' RIGHTS TO THE EQUAL PROTECTION AND THE DUE
PROCESS OF RIGHTS AND LAWS OF PROTECTED CLASS;**

PLAINTIFF SEEK MONETARY RELIEF FOR THE MUHC'S UNLAWFUL USE OF
42 C.F.R. PART 2 PATIENT RECORDS, IN THE MUHC'S UNLAWFUL USE OF
MR. REYNOLDS' IDENTITIES DATA IN TITLE 5 U.S.C. SEC. 552a RECORDS.

THE MUHC HAS PUNITIVELY DEFAMED MR. REYNOLDS' CHARACTER IN FALSE LIGHT AND HAS CAUSED MR. REYNOLDS' REPUTATION IRREPARABLE HARMS AND;

THE MUHC'S DISCRIMINATORY, RETALIATORY AND PUNITIVE ACTIONS AGAINST MR. REYNOLDS VIOLATED THE U.S.C.A AND CONST. AMENDS. 4-5-6 WITH THE CRUEL AND UNUSUAL PUNISHMENT OF AN INNOCENT MAN (MR. REYNOLDS) WITH GROSS NEGLIGENCE AND NEGLIGENCE PER SE BY THE MUHC'S FAILURES TO USE THE DEGREE OF CARE REQUIRED UNDER PARTICULAR CIRCUMSTANCES INVOLVED.

THE MUHC HAS EITHER DIRECTLY OR INDIRECTLY BY TWO OR MORE PERSONS CONSPIRE BY FORCE, INTIMIDATION, AND THREAT, FOR THE PURPOSE OF DEPRIVING MR. REYNOLDS OF THE EQUAL PROTECTION AND THE DUE PROCESS OF LAWS AND RIGHTS.

52. JUDICIAL REVIEW OF TITLE 5 U.S.C. SEC.552a RECORDS IS LIKELY TO BRING RELIEF WITH EXPUNGEMENT OF THE MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS AND THEIR ADVERSE AND HARMFUL AFFECTS UPON MR. REYNOLDS THAT IS CONTINUING TO CAUSE MR. REYNOLDS TO SUFFER UNJUSTIFIABLE PUNISHMENTS, PAINS AND FINANCIAL HARDSHIPS INCLUDING, BUT NOT LIMITED TO, MENTAL DISTRESS, EMOTIONAL TRAUMA, EMBARRASSMENT, HUMILIATION, AND LOST OR JEOPARDIZED PRESENT OR FUTURE FINANCIAL OPPORTUNITIES.

**(FTCA) CLAIM FOR ACTUAL INJURY IN FACT OF UNCONSTITUTIONAL
LOSS OF PROPERTY** UNDER COLOR OF LAW THE MUHC'S USE OF MR.
REYNOLDS 42 C.F.R. PART 2 RECORDS CONTINUES TO DEPRIVE MR.
REYNOLDS OF "THE OWNERSHIP OF HIS POSSESSIONS" (TANGIBLE PERSON
PROPERTY) **NOMINAL DAMAGES** VALUED AT MORE THAN OF \$20,000.
WITHOUT DUE PROCESS OF LAW.

**(FTCA) CLAIM FOR ACTUAL INJURY IN FACT OF UNCONSTITUTIONAL,
DAMAGES DIRECTLY AFFECT PERSONAL INTERESTS**

MR. REYNOLDS IS SUFFERING ADVERSE AND HARMFUL AFFECTS,
INCLUDING, BUT LIMITED TO, MENTAL DISTRESS, EMOTIONAL TRAUMA,
EMBARRASSMENT, HUMILIATION, AND LOST OR JEOPARDIZED PRESENT
OR FUTURE FINANCIAL OPPORTUNITIES;

IN 2011, MR. REYNOLDS OPERATED A CAMPGROUND/RV PARK WITHOUT
MR. REYNOLDS' FIREARMS RIGHTS MR. REYNOLDS COULD NOT PROVIDE
SECURITY FOR HIMSELF AND HIS PROPERTY;

THEREFORE MR. REYNOLDS' CAMPGROUND/RV PARK HAD TO BE SHUT
DOWN AND MR. REYNOLDS' LOSSES, LOST INCOME AND LOST FUTURE
FINANCIAL OPPORTUNITIES IS EXCEEDING \$90,000.00.

53. JUDICIAL REVIEW OF TITLE 5 U.S.C. 552a RECORDS IS LIKELY TO BRING RELIEF WITH THE EXPUNGEMENT OF THE MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS AND THEIR ADVERSE AND HARMFUL AFFECTS UPON MR. REYNOLDS; FROM, THE MUHC UNDER COLOR OF LAW HAS DEPRIVED MR. REYNOLDS' OF HIS FIRST, SECOND, THIRD, FOURTH, FIFTH, SIXTH, EIGHTH AND FOURTEENTH AMENDMENT RIGHTS OF THE UNITED STATES CONSTITUTION AND THE MUHC'S VIOLATIONS OF THE PRIVACY ACT;

THE MUHC'S UNLAWFUL MAINTENANCE OF MR. REYNOLDS' PROHIBITED TITLE 42 PART 2 PATIENT # 122-88-33-6 IDENTIFICATION RECORDS IS CONTRARY TO THE SPIRIT OF THE LAW TITLE 42 C.F.R. PART 2, AND IS CONTRARY TO MR. REYNOLDS' CONSTITUTIONAL RIGHTS, POWER, PRIVILEGES, OR IMMUNITIES.

THE MUHC HAS UNLAWFULLY WITHHELD OR UNREASONABLE DELAYED AND UNTIMELY VIOLATED THE PRIVACY ACT ENACTED IN 1974,

“TO PROTECT THE PRIVACY OF INDIVIDUAL IDENTIFIED IN INFORMATION SYSTEMS MAINTAINED BY FEDERAL AGENCIES” BY REGULATING “THE COLLECTION, MAINTENANCE, USE, AND DISSEMINATION OF

INFORMATION BY SUCH AGENCIES.” SEE; TITLE 5 U.S.C. 552a (4) (A)

AS A RESULT OF THE MUHC'S UNLAWFUL

(PRIVACY ACT-IMPROPER DISSEMINATION) AND;

AS A RESULT OF THE MUHC'S UNLAWFUL

(DENIAL OF ACCESS TO RECORDS),

68. JUDICIAL REVIEW OF TITLE 5 U.S.C. SEC. 552a RECORDS IS LIKELY TO BRING RELIEF WITH THE EXPUNGEMENT OF THE MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS AND THEIR ADVERSE AND HARMFUL AFFECTS, UPON MR. REYNOLDS AS A RESULT OF THE MUHC'S UNLAWFUL DELIBERATE OBSTRUCTIONS OF THE EQUAL PROTECTIONS AND THE DUE PROCESS OF LAWS AND RIGHTS AND THE MUHC'S DELIBERATE UNLAWFUL REFUSALS AND FAILURES OF OBSERVANCE OF PROCEDURES REQUIRED LAW.

**MR. REYNOLDS IS A WORKERS' COMPENSATION S.S.A. DISABLED
PATIENT STATUTES WERE DESIGNED TO PROTECT**

76. THE COURT TO REFER THE MATTER OF THE MUHC'S MAINTENANCE OF PROHIBITED TITLE 42 C.R.F. PART 2 IN TITLE 5 U.S.C. SEC. 552a RECORDS FREEDOM OF INFORMATION PRIVACY ACT RECORDS TO THE MERIT SYSTEM PROTECTION FOR INVESTIGATION.

PLAINTIFF CLAIM NEED FOR PUNITIVE DAMAGES

IN SUM OF TEN MILLION DOLLARS (\$10,000,000)

TO END ANY FUTURE REOCCURANCES;

CAUSE FOR ACTION (ZONE OF INTEREST)

THE TYPE OF INJURY IS PROTECTED BY STATUTE

SEE; UNITED STATES V. GRAHAM, 548 F. 2d 1302-8TH CIRCUIT 1977 1314, 1315

SEE: SEE; TITLE 42 CFR PART 2; TITLE 5 U.S.C. SEC. 552a

CRM 1872 CRIMINAL OFFENSES

THE MUHC EMPLOYEES ACTED INTENTIONALLY AND WILLFULLY

***IN THEIR ACTIONS IN THE CREATION OF MR. REYNOLDS' 42 C.F.R. PART 2
RECORD IDENTIFIER;***

77. THE MUHC COMPILED TITLE 5 U.S.C. SEC. 552a RECORDS FROM MR. REYNOLDS' PROTECTED 42 C.F.R. PART 2 PATIENT #122-88-33-6 IDENTITY AND PROTECTED HEALTHCARE INFORMATION AND IDENTIFIABLE HEALTHCARE INFORMATION WITHOUT A SHOWING OF GOOD CAUSE IN VIOLATIONS OF COURT ORDER, STATE AND FEDERAL LAW.
78. MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY RECORDS AND SIMILAR INFORMATION CANNOT BE RELEASED TO LAW ENFORCEMENT UNTIL A COURT ORDER HAS BEEN OBTAINED BY OFFICERS AUTHORIZING SUCH RELEASE. SEE: TITLE 42 C.F.R. PART 2.

TYPE OF INJURY IN FACT IS PROTECTED BY STATUTE

79. THE MUHC HAS REQUESTED MR. REYNOLDS' IDENTITY RECORDS UNDER FALSE PRETENSES, THROUGH THE MUHC'S UNAUTHORIZED AND UNLAWFUL ACTIONS OF ITS EMPLOYEES IN VIOLATIONS (d) (1) OF THE PRIVACY ACT, 42 C.F.R. PART 2.

80. AND THE MUHC HAS WILLFULLY RELEASED, DISCLOSED MR. REYNOLDS IDENTITY TO UNAUTHORIZED ENTITY,
81. IN THE MUHC'S COMMUNICATION OF ANY INFORMATION FROM THE RECORD OF PATIENT # 122-88-33-6, WHO HAS BEEN IDENTIFIED AS **MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY RECORDS AND** (PHI) AND (IHI) AND PATIENT CASE RECORD IDENTIFIERS: # 11B7-MH00368-01 AND INFORMATION ON MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY RECORDS THAT WERE DISSEMINATED TO UNAUTHORIZED INDIVIDUALS WERE IRRELEVANT, FALSE, MALICIOUS AND DEFAMATORY, INCOMPLETE, INACCURATE, AND UNTIMELY; SEE; TITLE 5 U.S.C. SEC. 552a

IV. CLAIM FOR RELIEF FROM THE MUHC'S LEGAL WRONG;

82. THE MUHC'S EMPLOYEES KNEW OR SHOULD HAVE KNOWN THEIR ACTIONS WERE IMPROPER AND UNLAWFUL;
- SEE; UNCONDITIONAL COMPLIANCE REQUIRED, TITLE 42 CFR 2.13 (a) (c) (2) IN VIOLATION OF THE PRIVACY ACT AND 42 U.S.C. A290ee-3 (2) (c), 42 U.S.C. A290dd-3 (2) (c) AND 42 C.F.R. A 2.61et seq. AND 42 U.S.C. 1981 EQUAL RIGHTS UNDER LAW AND TITLE 42 U.S.C. PART 2, TITLE 5 U.S.C. SEC. 552a , TITLE 42 U.S.C. 1981, 1983; 1985 TITLE 18 U.S.C. SEC 922, AND PUBLIC LAW 110-180, STANDARDS FOR ADJUDICATION RELATED TO MENTAL HEALTH.
- SEE; TITLE 42 C.F.R. PART 2 AND TITLE 18 U.S.C. 245 (2) (b) (1) (E)

THE MUHC IS PROHIBITED PRIOR TO THE DISSEMINATING OF

THE INFORMATION AND THE RECORDS RELATED TO MR. REYNOLDS,

THE DUTY BREACHED BY MUHC IS A CLEAR NONDISCRETIONARY DUTY
AND GOES FAR BEYOND ANY RATIONAL EXERCISE OF DISCRETION OF

THE EQUAL PROTECTIONS AND THE DUE PROCESS OF LAWS AND RIGHTS;

MR. REYNOLDS HAS ATTEMPTED TO ACCESS ANY AND ALL HIS MUHC
RECORDS ON HIMSELF, SO MR. REYNOLDS CAN CHALLENGES ANY
ERRONEOUS AND /OR FALSE INFORMATION.

85. DESPITE ALL EFFORTS,

86. MR. REYNOLDS HAS EXHAUSTED ALL REQUIRED AND AVAILABLE
ADMINISTRATIVE REMEDIES;

87. THE MUHC HAS NOT PERMITTED MR. REYNOLDS THE OPPORTUNITY
TO EVEN AN ADMINISTRATIVE LEGAL REVIEW HIS FILES.

CLAIM FOR RELIEF OTHER THAN JUST MONETARY FROM

MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS LEGAL WRONGS

MR. REYNOLDS HAS SUFFERED ADVERSE HARMFUL AFFECTS BY
REASON OF THE MUHC'S TITLE 42 C.R.F. PART 2 RECORDS LEGAL
WRONGS; THE WRONGS ALLEGED IN THIS COMPLAINT ARE ONGOING
AND ARE CONTINUING TO OCCUR AT THE PRESENT TIME BECAUSE OF
THE (MUHC) AGENCY ACTIONS IN WRONGFUL, RECKLESS, MALICIOUS
CONDUCT IN THE MUHC'S MANIPULATIONS OF TITLE 5 U.S.C. SEC. 552a
RECORDS;

88. MR. REYNOLDS HAS SUFFERED FROM THE MUHC'S UNCONSTITUTIONAL IMPOSITION OF PAINS AND PUNISHMENTS UPON MR. REYNOLDS FROM THE MUHC'S TITLE 5 U.S.C. SEC. 552a MISCONDUCT;

89. **THE BURDEN IS ON THE (MUHC) AGENCY TO SUSTAIN ITS ACTIONS**

SEE; TITLE 5 U.S.C. 552a (B) (3) (A) THE MUHC MUST ARTICULATE A SATISFACTORY EXPLANATION FOR ITS ACTION INCLUDING A RATIONAL CONNECTION BETWEEN THE DATA (THE FACTS) THE MUHC REVIEWED AND (THE FACTS OF THE MUHC ACTIONS) IN THE MAINTENANCE OF TITLE 5 U.S.C. SEC. 552a RECORDS,

THE MUHC'S MISREPRESENTATION OF 42 C.R.F. PART 2 RECORDS

IS MATERIAL TO THE LIABILITY OF MUHC

THE MUHC'S MATERIAL AND WILLFULL MISREPRESENTATION BY THE MUHC OF ANY INFORMATION WHICH IS REQUIRED TO BE DISCLOSED, VIOLATES TITLE 5 U.S.C. SEC. 552a.

98. THERE IS NO LEGAL JUSTIFICATION OR LEGAL BASIS FOR THE MUHC'S REFUSALS AND FAILURES TO OBSERVE PROCEDURES REQUIRED BY LAW;

99. THERE IS NO LEGAL JUSTIFICATION OR LEGAL BASIS FOR THE DENIAL BY THE MUHC OF MR. REYNOLDS' SAID RIGHTS;

100. MR. REYNOLDS HAS A LEGAL RIGHT UNDER THE PRIVACY AND FREEDOM OF INFORMATION ACTS TO OBTAIN THE INFORMATION HE SEEKS,

THEREFORE, PLAINTIFF, MR. REYNOLDS REQUESTS FOR THE COURT AWARDS HIM THE FOLLOWING RELIEF;

1. **MR. REYNOLDS REQUEST THE COURT MAKES SPECIFIC FINDING OF THE FACTS AND CONCLUSION OF LAW;**
2. EXPEDITE THIS ACTION IN EVERY WAY PURSUANT TO 28 U.S.C. 1657 (a);
AND
3. ORDER THE MUHC TO IMMEDIATELY DISCLOSE THE REQUESTED RECORDS IN THEIR ENTIRETIES TO MR. REYNOLDS;
4. DECLARE THAT THE MUHC VIOLATED THE PRIVACY AND FREEDOM OF INFORMATION ACTS;
5. INVOKE ITS EQUITABLE POWER TO EXPUNGE THE MUHC'S UNLAWFUL TITLE 5 U.S.C. 552a RECORDS OF MR. REYNOLDS'
6. TO COMPLETELY REMOVE FBI, NICS FEDERAL FIREARMS DISABILITIES, AND TOTALLY RESTORE MR. REYNOLDS' FEDERAL FIREARMS RIGHTS;
FOR THE EXPUNGEMENT CORRECTION TO THE FBI, NICS RECORDS MUST BE RECEIVED DIRECTLY FROM THE COURT
7. INVOKE ITS EQUITABLE POWER TO EXPUNGE THE MUHC'S UNLAWFUL TITLE 5 U.S.C. 552a RECORDS OF:
8. **ANY AND ALL OTHER RECORDS OF THE UNLAWFUL RELEASE, DISCLOSURE AND USE OF MR. REYNOLDS' PHI AND IHI PATIENT # 122-88-33-6, IDENTITY WITH THE USE OF PATIENT CASE RECORD IDENTIFIERS: # 11B7-MH00368-01 AND;**
9. **ANY AND ALL OF MR. REYNOLDS' IDENTITY RECORDS AND IDENTIFIABLE FINGERPRINTS AND OTHER BIOMETRICS RECORDS AND; FBI/NICS RECORD IDENTIFIERS: # 1575967167, # 4-KC-2745811,**
10. INVOKE ITS EQUITABLE POWER TO EXPUNGE ANY AND ALL OF THE MUHC'S UNLAWFUL TITLE 5 U.S.C. 552a RECORDS OR INFORMATION

MAINTAINED BY THE FBI THAT IS INACCURATE AND /OR DEROGATORY TO MR. REYNOLDS;

11. REFER THOSE MUHC EMPLOYEES RESPONSIBLE FOR VIOLATING THE PRIVACY ACT FOR PROSECUTION UNDER 5 U.S.C. 552a (i) (1);
12. AWARD PLAINTIFF REASONABLE COSTS AND ATTORNEY'S FEES AS PROVIDED IN 5 U.S.C. 552a (g) (3) (B), 552 (a) (4) (E) AND/OR 28 U.S.C. 2412 (d);
13. AWARD MR. REYNOLDS ANY ACTUAL DAMAGES UNDER 5 U.S.C. 552a (g) (4) (A), IN THE SUM OF \$10 MILLION UNITED STATES DOLLARS FOR THE MUHC'S PROHIBITED USE OF MR. REYNOLDS' TITLE 42 C.R.F. PART 2 RECORDS AND MR. REYNOLDS' TITLE 5 U.S.C. SEC. 552a RECORDS FOR THE PURPOSE OF THE MUHC'S DEPRIVATIONS OF MR. REYNOLDS' CIVIL RIGHTS FOR IN MUHC'S UNLAWFUL RECORDS CONSPIRACIES **DELIBERATELY INFLICTING THE CONDITION OF LIFE CALCULATED TO BRING ABOUT ITS PHYSICAL DESTRUCTION IN WHOLE OR IN PART;**
14. IN THE MUHC'S UNCONSTITUTIONAL IMPOSITION OF PAINS AND PUNISHMENTS UPON MR. REYNOLDS FOR HIS PARTICIPATION IN FEDERAL ASSISTED PROGRAMS.
15. THE EXACT AMOUNT OF ACTUAL DAMAGES WHICH IS TO BE DETERMINED AT TRIAL BY JURY BUT IS NOT LESS THAN \$1000 OF ACTUAL MONETARY DAMAGES.
16. DUE TO THE DEFENDANTS' NEGLIGENCE OF AS SET FORTH
BY REASON OF THE DEFENDANTS' AFORESAID CONDUCT AS SET FORTH MR. REYNOLDS IS SUFFERING ADVERSE AND **IRREPAIRABLE HARMFUL** AFFECTS INCLUDING, BUT LIMITED TO, LOST OR JEOPARDIZED PRESENT OR FUTURE FINANCIAL OPPORTUNITIES, MENTAL DISTRESS, EMOTIONAL

TRAUMA, EMBARRASSMENT, HUMILIATION, FRIGHT, LOSS OF PROPERTY,
LOSS OF FREEDOM, LOSS OF FUNDAMENTAL RIGHTS;

PLAINTIFF MARK PAUL REYNOLDS REQUEST FOLLOWING RELEIF:

A. COMPENSATORY DAMAGES

IN THE AMOUNT OF TEN MILLION DOLLARS (\$10,000,000)

B. PUNITIVE DAMAGES

IN THE AMOUNT OF TEN MILLION DOLLARS (\$10,000,000)

TO END ANY FUTURE REOCCURANCES

**C. AN AWARD OF FEES, COSTS AND DISBURSEMENT OF ACTION
PURSUANT TO 42 U.S.C. 1988**

D. GRANT SUCH ANY FURTHER RELIEF AS THE COURT MAY DEEM JUST
AND PROPER.

WHEREFORE, PLAINTIFF MARK PAUL REYNOLDS DEMANDS JUDGEMENT
IN THE SUM TEN MILLION DOLLARS (\$10,000,000) IN COMPENSATORY
DAMAGES, TEN MILLION DOLLARS (\$10,000,000) IN PUNTIVE DAMAGES
PLUS FEES, COST AND DISBURSEMENT OF THIS ACTION OF HIS PROTECTED
CLASS.

V. CERTIFICATION AND CLOSING

UNDER FEDERAL RULE OF CIVIL PROCEDURES 11, BY SIGNING BELOW, I
CERTIFY TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF
THAT THIS COMPLAINT:

(1) IS NOT PRESENTED FOR AN IMPROPER PURPOSE, SUCH AS TO HARASS, CAUSE UNNECESSARY DELAY, OR NEEDLESS INCREASE THE COST OF LITIGATION; (2) IS SUPPORTED BY EXISTING LAW OR BY A NONFRIVOLOUS ARGUMENT FOR EXTENDING, MODIFYING, OR REVERSING EXISTING LAW; (3) THE FACTUAL CONTENTIONS HAVE EVIDENTIARY SUPPORT OR, IF SPECIFICALLY SO IDENTIFIED, WILL LIKELY HAVE EVIDENTIARY SUPPORT AFTER REASONABLE OPPORTUNITY FOR FUTHER INVESTIGATION OR DISCOVERY; AND

(4) THE COMPLAINT OTHER COMPLIES WITH THE REQUIREMENTS OF RULE 11.

I AGREE TO PROVIDE THE CLERK'S OFFICE WITH ANY CHANGES TO MY ADDRESS WHERE CASE-RELATED PAPERS MAY BE SERVED.

I UNDERSTAND THAT MY FAILURE TO KEEP A CURRENT ADDRESS ON FILE WITH THE CLERK'S OFFICE MAY RESULT IN THE DISMISSAL OF MY CASE. RESPECTFULLY SUBMITTED, DATE OF SIGNING: 5/14/2020

SIGNATURE OF PLAINTIFF: Mark P Reynolds

PRINTED NAME OF PLAINTIFF: MARK P REYNOLDS PRO SE

ADDRESS OF PLAINTIFF: 9560 STATE ROAD O, STEEDMAN MO, 65077-1310